



Fresh produce from our families to yours.

May 30, 2008

Ms. Delores Brown
Chief, Office of Environmental Compliance
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236
Submitted via e-mail to: delores@water.ca.gov

**Re: Environmental Impact Report and Environmental Impact Statement for the
Bay Delta Conservation Plan Scoping**

Dear Ms. Brown:

On behalf of the members of Western Growers, I am writing in regard to the Environmental Impact Statement (EIR/EIS) scoping process for the Bay Delta Conservation Plan (BDCP). Western Growers is an agricultural trade association whose members from Arizona and California grow, pack, and ship ninety percent of the fresh fruits, nuts and vegetables grown in California and seventy five percent of those commodities in Arizona.

As a trade association representing roughly half of the nation's fresh fruit, vegetable and tree nut production, our members are heavily dependent on a reliable water supply to grow their high quality, nutritious crops. Therefore, Western Growers have been actively engaged in working collaboratively in hopes of finding consensus on a comprehensive, long-term solution to California's water needs.

California's natural water conditions have historically resulted in frequent uncertainty for California's specialty crop growers. However, the federal court decision issued in August 2007 has heightened that level of uncertainty to a point that is no longer tolerable for the specialty crop industry. In anticipation of reduced Delta pumping as a result of the federal Wanger decision, Western Growers financed an economic impact study in attempt to quantify the potential impacts to California's \$32 billion agriculture industry. The study estimated that is 2008 is a dry water year that a temporary reduction in pumping from the Delta would result in 4,000 to 67,000 unplanted acres resulting in \$18 to \$167 million in lost agriculture production. The corresponding indirect and induced impact to the economy would result in total regional economic losses of \$30 to \$270 million in output, 200-2,400 jobs and \$15 to \$140 million in personal income.

The actual impact of unreliable water conveyance to California agriculture is still unfolding and continuously worsening for farmers and rural communities dependent upon farming activities. This dynamic further underscores that time is not on our side and the need for a more sustainable water system has never been more urgent. While we believe inaction is not a viable option, we believe it is critical that the BDCP EIR/EIS scoping process fully disclose the impacts to agriculture, the state's economy and environmental quality under the 'no action' alternative.

Species are in drastic decline and California's productive open space is in jeopardy because our water system is in crisis. Western Growers believes that any 'fix' implemented must be comprehensive in nature and utilize all of the water supply management tools at our disposal including water use efficiency, water recycling, surface and groundwater storage, desalination, and other strategies. However, in order for these tools to work effectively, a comprehensive solution must also include a Delta fix that improves ecosystem conditions and water conveyance for the economy. For these reasons, Western Growers is very supportive of considering and pursuing alternative Delta conveyance options and urges further exploration of the dual, isolated and through-Delta conveyance alternatives

Please contact me by phone at 916-446-1435 or via e-mail at efield@wga.com if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erin Field', with a stylized, flowing script.

Erin Field
California Government Affairs Manager